REBUTTAL TESTIMONY OF
ALLEN W. ROOKS
ON BEHALF OF
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2020-125-E

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT POSITION.

A. My name is Allen W. Rooks. My business address is 400 Otarre Parkway, Cayce, South Carolina 29033. I am employed by Dominion Energy Southeast Services ("DESS") as Manager of Electric Pricing and Rate Administration for Dominion Energy South Carolina, Inc. ("DESC" or the "Company").

Q. HAVE YOU PREVIOUSLY SUBMITTED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes, I have.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to rebut or clarify certain rate design, rate administration, or reporting proposals made by the intervening parties to this proceeding and to provide an updated copy of Exhibit No. ___ (AWR-1), which was previously provided in my prefiled direct testimony. Unless otherwise noted, my responses will pertain to matters of electric rates, rate design, rate administration, and the Company's General Terms & Conditions.

SOUTH CAROLINA OFFICE OF REGULATORY STAFF ("ORS") DIRECT TESTIMONY

Q. HAVE YOU REVIEWED THE PREFILED DIRECT TESTIMONY OF THE ORS IN THIS PROCEEDING?

A. Yes.

Q. DO YOU HAVE ANY CONCERNS FROM A RATE ADMINISTRATION PERSPECTIVE WITH THE PROPOSALS MADE BY ORS?

A. Yes. With respect to the prefiled direct testimony of ORS witness Bickley regarding Storm Damage recovery matters, I would like to address his proposals found on lines 19 and 20 of page 10 and lines 4 and 5 of page 12.

Mr. Bickley's proposal on page 10 that "Storm Rider collections from customers should not exceed $5 million in any twelve-month period," while well-intentioned, would create rate administration issues. First, the Company bills its customers in daily cycles, to evenly distribute workload across each month. If this proposal to establish a "hard cap" were to be adopted, it is probable that the Company would need to halt collections under the Rider (when reaching the stated $5 million threshold) at some point during the middle of a month. The result would be that certain customers billed on the earlier billing cycles during that month would be assessed the Storm Rider charge, while customers in later cycles would not. This would create a fundamental fairness issue for customers based solely on the day of the month that they are billed. A second issue with this approach is that it could cause the Rider to be turned on and off in rapid succession to comply with a hard cap of $5 million over any twelve-month period. This would cause multiple rate schedule changes, customer confusion about the rates being charged, and create the potential for billing errors. By establishing the Storm Rider factors per kWh, as shown in my direct testimony Exhibit No. ___ (AWR-5) or in ORS witness Michael Seaman-Huynh's Exhibit MSH-3, the Commission is effectively "capping" what customers can be charged for storm damage recovery for each kWh billed. No additional cap is necessary.

Regarding the proposal to begin collecting the Storm Rider on June 1st found on page 10 of Mr. Bickley's testimony, delaying the inception of the Storm Rider until then will create the likelihood of three retail electric rate changes in a span of a little over 90 days. The Company has proposed that the rates ordered by the Commission in this proceeding take effect on the first billing cycle of March 2021; in May of 2021, any rate updates ordered by the Commission as a result of the Company's annual fuel proceeding, DSM Update, or Pension Rider change (if necessary), would take effect; then, if Mr. Bickley's proposal regarding the Storm Rider is adopted, retail electric rates would update again in June of 2021. The Company's customers have not traditionally seen electric rate changes in such rapid succession, and once again, the potential for customer confusion would be the result.

Q. WHAT IS YOUR RECOMMENDATION WITH RESPECT TO MR. BICKLEY'S SPECIFIC STORM RIDER PROPOSALS DISCUSSED ABOVE?

A. My recommendation is that the Commission reject Mr. Bickley's proposal to establish a hard cap on annual Storm Rider collections for the reasons set forth above and to reject Mr. Bickley's proposal to delay Storm Rider implementation until the month of June. These proposals, when taken together, would increase the likelihood for customer confusion by increasing the frequency of electric rate changes, create fairness issues on how the Storm Rider is applied, and would complicate the Company's ability to track Storm Rider collections accurately for reporting purposes.

Q. DOES MR. BICKLEY ALSO MAKE RECOMMENDATIONS ON STORM RIDER REPORTING REQUIREMENTS?

A. Yes. He proposes that the Company should provide to the Commission and ORS a detailed quarterly report on the various transactions affecting storm reserve balances and that this report should be included in the Company's quarterly financial reports.

Q. IS THIS REQUIREMENT NECESSARY?

A. No. The Company believes separate, formal and detailed quarterly reporting on a mechanism that would make up, at most, approximately 0.5% of the current residential 1,000 kWh bill amount to be excessive. If the Commission were to approve reinstatement of the Storm Damage Component Rider, the Company plans to provide this Storm Reserve balance in its quarterly financial reporting under the category of "Net Deferred Debits/Credits" as a ratebase item and believes that balance would reflect the most relevant indicator of the status of collections and expenditures under the storm recovery mechanism each quarter.

If the Commission deems Mr. Bickley's additional reporting requirement to be necessary, it should only require reporting such detail on an annual basis, at the most.

Q. ARE YOU ADDRESSING ANY OF THE OTHER STORM RIDER RECOMMENDATIONS OF ORS WITNESS BICKLEY IN THIS REBUTTAL TESTIMONY?

A. No. The other Storm Rider proposals offered up by Mr. Bickley are addressed in the Rebuttal Testimony of Company witnesses Kissam and Coffer.

Q. WITH RESPECT TO THE TESTIMONY OF ORS WITNESS RYDER THOMPSON, HOW DOES THE COMPANY RESPOND TO HIS RECOMMENDATION THAT THE COMPANY BE REQUIRED TO PROVIDE QUARTERLY FILINGS RELATED TO ITS INVESTMENTS MADE TO SUPPORT ECONOMIC DEVELOPMENT ACTIVITIES IN THE DESC SERVICE TERRITORY?

A. The Company would point out that much of the information requested by Mr. Thompson is already largely available in the public domain through S.C. Department of Commerce and industry news releases, as well as other local media. It is important to note that there can be extended lead times between the announcement of new projects/investment and the actual jobs associated with them. For these reasons, if the Commission deems that reporting on these matters should be required, the Company believes an annual summary reporting requirement would be more reasonable than a quarterly requirement.

Q. WITH RESPECT TO THE TESTIMONY OF ORS WITNESS MICHAEL SEAMAN-HUYNH, ARE THERE ANY ISSUES THAT YOU WOULD LIKE TO ADDRESS?

A. Yes. The Company concurs with the adjustments to rate design described on pages 5-7 of ORS witness Mr. Seaman-Huynh. These errors were found after my testimony was filed and have been corrected. A Corrected Exhibit No. ___ (AWR-1) is attached to this rebuttal testimony to reflect the Company's request with these corrections incorporated. No changes to the proposed rates filed in the Company's application have been made and DESC confirms that the total impact is a decrease of $8,330 to its proposed request.

Also, in ORS witness Seaman-Huynh's testimony, there is a recommendation to modify the Company's proposed change to Section IV.D.(5) of its General Terms and Conditions to incorporate additional language from the PSC Rules and Regulations. The Company does not oppose adding the additional language as recommended.

Q. HOW DOES THE COMPANY RESPOND TO ORS WITNESS SEAMAN-HUYNH'S RECOMMENDATION THAT THE COMPANY'S PROPOSED MODIFICATIONS TO SECTION V. OF THE COMPANY'S GENERAL TERMS AND CONDITIONS BE DENIED?

A. Any claim that the Company seeks to limit liability for its own negligence and require customers to indemnify the Company for such negligent acts is misplaced. The proposed revisions to Section V. of the Company's General Terms and Conditions do not and were not intended to limit the Company's liability for its own negligence. The proposed revisions only address situations involving damages to or injuries resulting from customer actions, equipment and wiring within customer control, or equipment or wiring of third-parties other than the Company or the customer. The revisions also keep in place the language addressing the "use, care, or handling of electricity delivered to the Customer after it passes the service point." Nothing in the revised language addresses damages to or injuries resulting from actions of the Company.

The Company is proposing these revisions to clarify customer responsibility for injuries or damages arising from customer or third-party actions. The current language in Section V. of the General Terms and Conditions has caused confusion with customers and needs clarification to clearly articulate customer responsibility independent of the actions of the Company. The language merely offers additional language to assist the customer in understanding where Company responsibility ends and customer responsibility begins.

ORS also claims that the proposed revisions improperly require the customer to indemnify the Company in situations of overhead high voltage line contact. This also misconstrues the language in the proposed revisions. The indemnification language again applies only to damages or injuries arising from or caused by the customer, customer equipment/wiring, or actions of third-parties in contact with overhead high voltage lines. The language does not require or even suggest that the customer would indemnify the Company from its own negligence.

ORS position would have the Company to assume all liability regardless of who causes the damage or injury by interacting with the overhead high voltage lines. The Company is not required to assume liability when injury or damage results from actions of a customer or another person. The Company seeks no more than what the law allows—it should not be responsible for damages or injuries resulting from the actions of others in proximity to the Company's overhead high voltage lines.

The Commission should adopt the proposed revisions in Section V. of the General Terms and Conditions in order to bring clarity to the customer for understanding where Company responsibility ends and customer responsibility begins.

DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES (DOD-FEA) DIRECT TESTIMONY

Q. PLEASE SUMMARIZE THE RATE DESIGN RECOMMENDATIONS PROPOSED IN THE DIRECT TESTIMONY OF DOD-FEA WITNESS MARK GARRETT.

A. Mr. Mark Garrett recommends that the Company increase its power factor threshold from its current level of 85% to 90% (see p. 77 of the prefiled direct testimony of M. Garrett); that the Commission should require DESC to redesign Rate 24 (and Rate 23) to recognize the additional Billing kW that results from application of the raised threshold (M. Garrett, p. 77); and that the Company revise the Availability criteria of its Industrial Power Service Rate 23 to include an annual load factor minimum of 60% or higher (M. Garrett, pp. 79-80).

Q. DOES THE COMPANY AGREE THAT HIGHER CUSTOMER POWER FACTORS LEAD TO MORE EFFICIENT USE OF REAL POWER?

A. Yes. As stated in the Company's response to DOD-FEA discovery and reiterated in Mr. M. Garrett's testimony, this "promote[s] efficient use of power, minimize[s] line losses, and reduce[s] costs for other customers."

Q. DOES THE COMPANY BELIEVE THAT INCREASING THE POWER FACTOR REQUIREMENT FROM THE CURRENT 85% LEVEL IS WARRANTED AT THIS TIME?

A. No. This minimum power factor threshold has been maintained in Company rates and operations for decades; and based upon an examination of rate schedules, the 85% level is also currently utilized by other large South Carolina electric utilities Duke Energy Carolinas, Duke Energy Progress, and Santee Cooper. If DESC is ordered by the Commission to raise its minimum power factor requirement to 90%, or some higher level, the manufacturers within its service territory that have higher amounts of inductive load (e.g. motors) in their operations would likely be subject to either higher rate schedule charges due to power factor corrections or higher capital costs in order to deploy equipment that would raise the power factor at their facilities. Such a requirement would also place DESC's retail electric service territory at a competitive disadvantage to other South Carolina utilities in its economic development and recruiting efforts for prospective customers with large electric loads.

Q. HAS THE COMPANY QUANTIFIED THE INCREASE IN COSTS THAT WOULD RESULT FROM SUCH A CHANGE FOR ITS LARGE GENERAL SERVICE RATE 23 AND RATE 24 CUSTOMERS?

A. While the Company has not prepared a formal analysis of what a change from 85% to 90% power factor would look like, it estimates an additional \$2.0 - \$2.5 million in annual power factor corrections would be imposed on certain of its Large General Service customers that currently have power factors between 85% and 90%. This is only an estimate of potential rate schedule impacts and does not factor in capital improvements that may be required at customer facilities.

As the Company does not support DOD-FEA's recommendation for an increase to the power factor, I am not addressing Mr. M. Garrett's proposal "to recognize the additional Billing kW that results from application of the raised threshold" in this rebuttal testimony.

Q. DO YOU AGREE WITH WITNESS M. GARRETT'S CHARACTERIZATION ON PAGES 73-74 THAT THERE IS A 'FLAW' IN DESC'S POWER FACTOR CORRECTION METHOD?

A. No, there is not a flaw. The Company bills its Rate 23 and 24 customers on kW (real power) demand, not kVA (apparent power) demand, with a minimum required power factor of 85%. Power factor is calculated by dividing kW by kVA, so there is no flaw.

Q. WHAT IS THE COMPANY'S RESPONSE TO MR. M. GARRETT'S PROPOSAL TO ELIMINATE THE SIC & NAICS REQUIREMENTS AND ESTABLISH A LOAD FACTOR THRESHOLD FOR QUALIFICATION ON THE COMPANY'S INDUSTRIAL POWER SERVICE RATE 23?

A. Order No. 1993-465 in Public Service Commission of South Carolina Docket No. 1992-619-E approved changes to the Company's Rate 23 limiting its availability to accounts classified as industrial by Standard Industrial Classification ("SIC") codes.

The Company's direct testimony during that general rate proceeding stated "Industrial customers devote large amounts of their electric usage to production which is not weather sensitive. Accordingly, they have a much better load factor -- that is, their year round use is much higher compared to their contribution to summer peak. Non-industrial load is generally more weather sensitive. Non-industrial customers show much higher increases in demand during summer peaks when the weather is hot. Accordingly, they have much more ability to control peak contribution by load shifting. Moving these customers off Rate 23 to Time-Of-Use rates will assist in conservation efforts. Non-industrial accounts are proposed to be moved to Rate 24 - Large General Service Time-of-Use. However, these customers will be able to choose from any of the other rates available to them. This change will provide economic incentives for these non-industrial customers to engage in load management techniques that will be cost beneficial and increase energy efficiency."

The Company finds these arguments to still hold true today, and sees no reason why the current Availability criteria for Rate 23 established by the Commission in Order No. 1993-465 should be changed or modified to include an arbitrary load factor threshold.

Q. PLEASE SUMMARIZE YOUR RESPONSE TO THE RECOMMENDATIONS FROM DOD-FEA WITNESS M. GARRETT.

A. First, I would like to state that the Company is proud to provide service to and support all military installations and other federal facilities in its South Carolina footprint. While I can appreciate Mr. M. Garrett advocating on behalf of his client, I cannot support any of his proposals to modify DESC's Large General Service rates in this proceeding, because they have the potential to impose cost shifts on manufacturing customers and expose the Company to rate migration and revenue loss coming out of this case. The Company's rates and rate structures for its Large

General Service class of customers have evolved over the years through various rate proceedings to promote economic use of power and support industrial recruitment and jobs in South Carolina, and changes of the sort proposed by Mr. M. Garrett should be studied carefully and deliberately for their implications before acting, and not be done hastily during a rate proceeding.

DIRECT TESTIMONY OF WALMART, INC

Q. PLEASE SUMMARIZE WALMART WITNESS LISA PERRY'S PROPOSAL FOR THE COMPANY TO RECOVER STORM DAMAGE COMPONENT COSTS.

A. Ms. Perry recommends that DESC's demand-metered customers be charged for Storm Damage recovery through the demand, or $/kW, charges in the Company's rates.

Q. WHAT IS THE COMPANY'S POSITION WITH RESPECT TO THIS PROPOSAL?

A. While the Company does not disagree with the premise that demand-related costs should be recovered through demand-related charges where possible, the Company believes that it is in the best interest of its customers to recover all storm-related costs through a uniform recovery mechanism. In the case of Storm Damage recovery, that translates to the kWh energy charges in its rate schedules. Nearly all of the Company's metered service rate schedules have an energy charge. The same is not true with respect to demand charges. Assessing the Storm Damage

Component Rider through energy charges provides a comparable frame of reference for each class of customers, because they are easily able to determine what they pay in relation to the other classes of service.

Given that the cost allocation and assignment to each class is performed on a demand basis, most of the concern raised by Ms. Perry is mitigated. Also, the Storm Damage Component was approved by the Commission for recovery through energy charges and functioned well through its suspension in 2010 and no other party has opposed the method for collecting these costs in this proceeding.

For those reasons, DESC believes that this proposal should be rejected and that any Commission-approved Storm Damage Component recovery be continued through the per kWh energy charges in its rate schedules for all customer classes.

DIRECT TESTIMONY OF AARP

Q. PLEASE SUMMARIZE AARP WITNESS RUBIN'S RATE DESIGN PROPOSALS.

A. Mr. Rubin's Direct Testimony focuses on a number of proposed changes to residential rate design, to include leaving the Rate 8 (and by extension Rates 1 and 6) Basic Facilities Charge ("BFC") unchanged, lowering the Rate 2 BFC, and eliminating Rates 5 and 7. He also encourages the Commission to open a separate investigation "[requiring] the Company to demonstrate that the continuation of

[Rates 1 and 6], as well as the level of discount, are consistent with cost-based ratemaking."

Q. DO YOU AGREE WITH MR. RUBIN'S PROPOSAL TO MAINTAIN DESC'S RESIDENTIAL BFC'S AT THEIR CURRENT LEVELS?

A. No. On page 7 of his Direct Testimony, Mr. Rubin states that "[he does] not find it reasonable to collect 40% of the revenue increase from the BFC, when the BFC provides less than 9% of the residential base revenues under existing rates." This is not a valid comparison, as Mr. Rubin is comparing the BFC percentage of the residential *increase* to the BFC percentage of the *total residential revenue*. After calculating the amount of BFC revenue realized under current residential rates (approx. $68.7 million) and dividing by current residential revenues (as shown on Corrected Exhibit No. ___ (AWR-1)), I arrive at a percentage of 6.8%. Then, I calculate the amount of BFC revenue that would be realized under the Company's proposed residential rates in this application (approx. $87.6 million) and divide that number by proposed residential revenues (also shown on Corrected Exhibit No. ___ (AWR-1)), and arrive at a percentage of 8.1%. This is a more appropriate way to examine what portion of the Company's residential revenue is realized from its BFC's, and demonstrates that the Company's proposed request is hardly an unreasonable one from a rate design perspective, as Mr. Rubin suggests.

Mr. Rubin goes on to assert on page 8 of his Direct Testimony that most of the costs included in DESC's Cost of Service Study as "customer-related" are allocated portions of Company overheads or demand-related costs. The company overheads Mr. Rubin refers to are directly related to billing, meter reading, and other customer service functions. The distribution costs discussed by Mr. Rubin are the secondary lines (overhead and underground) and related transformers which are the last level of the distribution system, ending at the customer's meter. The costs per customer are similar within each customer class, and not dependent on customer demand as suggested by Mr. Rubin. The Company has allocated these costs in a similar manner for over 30 years, believes them to be valid customer-related costs, and a reasonable basis for evaluating its BFC's.

Also, ORS reviewed the Company's BFC proposals in the application and "[did] not object to the Company's proposed BFC of $11.50/month" and went on to state that the "proposed increase will closely align DESC's residential BFC with DEC ($11.96/month) and DEP ($11.78/month) and is a gradual, as opposed to drastic, increase in fixed charges."

For these reasons, the Company believes its proposed residential BFC increase to be reasonable and cost justified.

Q. DO YOU AGREE WITH MR. RUBIN'S PROPOSAL TO ELIMINATE RESIDENTIAL RATES 5 (TIME-OF-USE) AND 7 (TIME-OF-USE DEMAND)?

A. No. While there are relatively few customers taking service under these rates, the Company believes that it is important to continue offering these rate options for its residential customers interested in shifting their electric loads from On- to Off-peak periods. Indeed, customer testimony has been presented in the public night hearings for this rate proceeding inquiring about and expressing interest in Time-of-Use rates. To go a step further, the Company's current Time-of-Use rate schedules have their genesis in the Public Utility Regulatory Policies Act of 1978 ("PURPA"), which required that "Time-of-Day" rates be made available to each class of consumers. Eliminating Time-of-Use rate options for residential customers could place the Company in violation of the PURPA. DESC would also point out that this proposal would place the Company in direct contravention of S.C. Code Ann. § 58-27-845(B) and 845(D).

Mr. Rubin's proposals to eliminate Rates 5 and 7 should therefore be rejected.

Q. IS A COMMISSION INVESTIGATION OF RATE 6 (AND RATE 1) NEEDED, AS MR. RUBIN SUGGESTS ON PAGE 12 OF HIS DIRECT TESTIMONY?

A. No. Mr. Rubin justifies such a request based upon the simple fact that the average customer on Rate 6 actually uses more electricity than the average Rate 8 customer. While this is factually accurate, it ignores an important point that the Company's population of Rate 8 customers includes a higher percentage of multi-family type dwellings than Rate 6. These include apartments and condominiums, which are generally smaller in size, and by extension, consume less electricity for heating and cooling purposes. Also, the Company has reviewed analysis from its DSM programs that demonstrates Rate 6 customers use less electricity per square foot than its Rate 8 customers.

Based on these data points, the Company does not believe an investigation is needed on this matter.

DIRECT TESTIMONY OF THE SOUTH CAROLINA DEPARTMENT OF CONSUMER AFFAIRS ("DCA")

Q. PLEASE SUMMARIZE THE PRIMARY RATE DESIGN RECOMMENDATION FOUND IN WITNESS DR. DAVID DISMUKES DIRECT TESTIMONY.

A. DCA witness Dr. David Dismukes' primary recommendation is that the Commission reject the Company's proposed increase in customer charges.

Q. DOES THE COMPANY AGREE WITH DR. DISMUKES RECOMMENDATION?

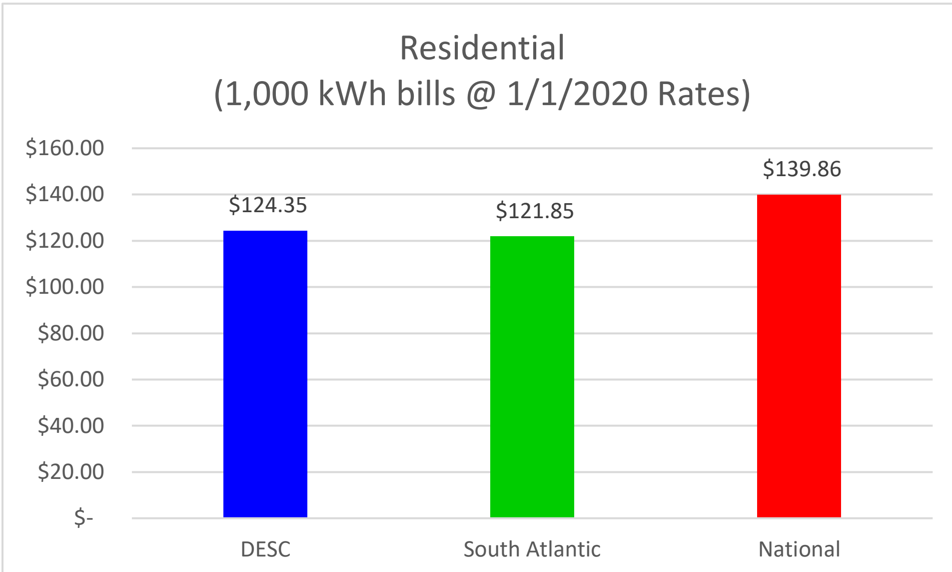
A. No. For the reasons set forth above in discussing the Company's response to AARP witness Rubin, the Company believes that its proposed customer charges (or BFC's) are both reasonable and cost justified across all of its customer classes. It is notable that Dr. Dismukes makes no mention of the customer charges resulting from the Company's cost of service study, and how its proposed BFC's are lower than the cost to serve for all but one class of service. Also worth noting is that Dr. Dismukes analysis on pp. 35-36 reveals that the average customer charge for his survey of regional utilities is $12.93. Even after DESC's proposed change to its residential BFC, the Company would remain well below this regional average. Instead, Dr. Dismukes presents the argument that raising the BFC would harm the public policy goal of promoting energy efficiency and disregards the fact that even after the Company's proposed increase, well over 90% of residential revenues would still be recovered from customers through an energy charge. DESC's proposal can hardly be classified as a wholesale change to its rate design, and Dr. Dismukes offers no substantive proof of how the change would impact energy efficiency in the Company's territory. He only cites studies that draw general conclusions that higher customer charges harm energy efficiency efforts.

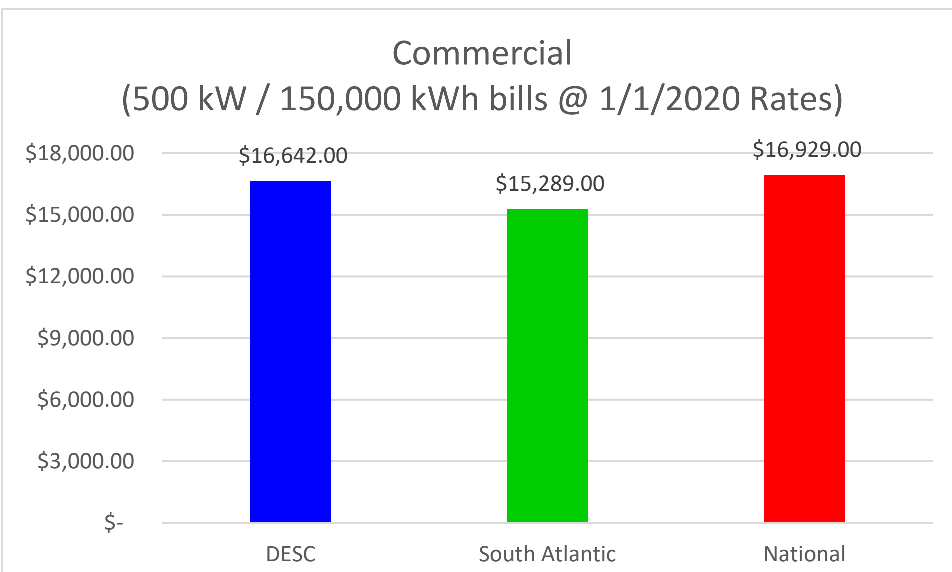
For these reasons, the Commission should reject DCA's recommendation that the Company's proposed customer charge increase be denied.

DIRECT TESTIMONY OF THE SOUTH CAROLINA ENERGY USERS COMMITTEE ("SCEUC")

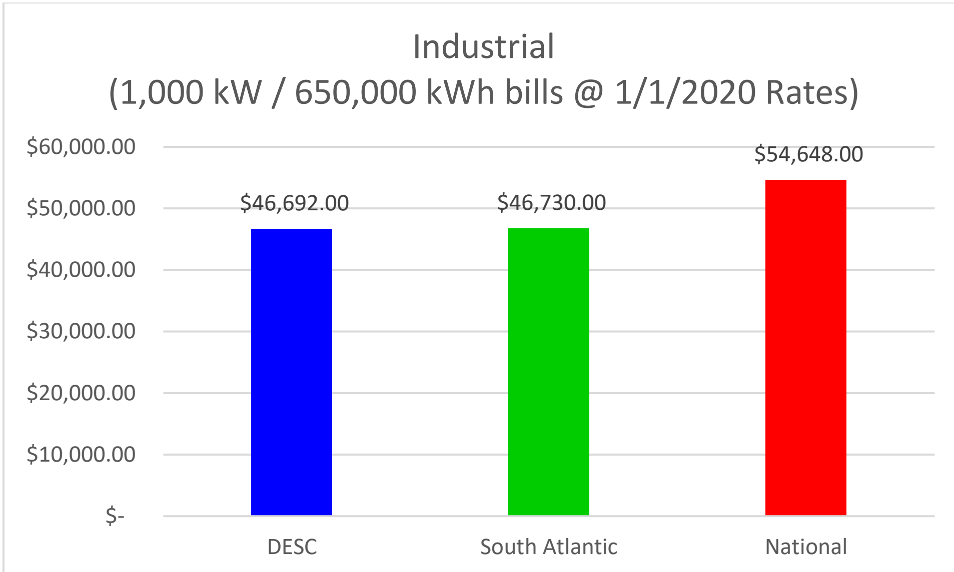
Q. DO YOU AGREE WITH SCEUC WITNESS MR. KEVIN O'DONNELL'S ASSERTION ON PAGE 10 OF HIS DIRECT TESTIMONY THAT DESC IS A HIGH COST UTILITY?

A. No. Mr. O'Donnell uses information that the Company reports to the Energy Information Administration based upon the revenues and sales recognized by the Company each month. These reported revenues include amounts associated with the Refund Credits to DESC's Capital Cost Rider, and do not necessarily reflect billed rates to customers. As an example below, I present three charts showing residential, commercial, and industrial bill comparisons for DESC relative to the South Atlantic and National Averages for Investor-Owned Utilities, as reported by the Edison Electric Institute.[1] Since this report is used exclusively for rate comparison purposes, the "Typical Electric Bills, Annualized Rates" section of the report only reflects the billed rate schedule charges assessed by the Company.





[1] Source: EEI Typical Bills and Average Rates Report Winter 2020. As of the time of filing for this rebuttal testimony, the Summer 2020 Report is not yet available.



While these comparisons do not reflect DESC as the least cost provider, they similarly do not present the Company as a "high cost utility," as Mr. O'Donnell and others have characterized in this proceeding. It is also important to note, these rates do not reflect the Company's rate **decrease** that took effect in May of this year, as EEI's Summer 2020 Report is not yet available as of the time of the filing of this testimony.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

DOMINION ENERGY SOUTH CAROLINA

RATE DESIGN SUMMARY
PROPOSED INCREASE OVER CURRENT (MAY 2020) RATES
TWELVE MONTHS ENDING 12/31/2019 TEST PERIOD

CUSTOMER CLASS	CURRENT ANNUALIZED REVENUE	PROPOSED INCREASE: STORM DAMAGE COMPONENT	PROPOSED INCREASE: BASE RATE INCREASE	DSM COMPONENT DECREASE	PROPOSED REVENUE (NET)	$ CHANGE	% CHANGE
RESIDENTIAL	$ 1,009,033,061	$ 5,035,088	$ 78,114,867	$ (5,117,629)	$ 1,087,065,387	$ 78,032,326	7.73%
SMALL GENERAL SERVICE	$ 425,981,612	$ 1,907,290	$ 33,479,574	$ (4,695,399)	$ 456,673,077	$ 30,691,465	7.20%
MEDIUM GENERAL SERVICE	$ 190,285,450	$ 769,065	$ 15,912,212	$ (1,151,097)	$ 205,815,630	$ 15,530,180	8.16%
LARGE GENERAL SERVICE	$ 470,207,030	$ 1,308,201	$ 39,813,588	$ (331,284)	$ 510,997,535	$ 40,790,505	8.68%
LIGHTING	$ 60,165,428	$ 720,957	$ 1,164,182	$ -	$ 62,050,567	$ 1,885,139	3.13%
RETAIL TOTAL	$ 2,155,672,581	$ 9,740,601	$ 168,484,423	$ (11,295,409)	$ 2,322,602,196	$ 166,929,615	7.74%

TOTAL PROPOSED INCREASE: $ 178,225,024